

**You must use black ink to fill out this form.**

Your Name: ANNE P. MULLIGAN \_\_\_\_\_

Mailing Address: GENERAL DELIVERY \_\_\_\_\_

ANCHORAGE, AK 99501 \_\_\_\_\_

Telephone: \_\_\_\_\_ Message phone: (907)717-5175 \_\_\_\_\_

NOTE: If for any reason you do not wish the other party to know your physical address, you must still provide a mailing address so that the court and the other party can serve you by mail.

IN THE SUPREME COURT OF THE STATE OF ALASKA

ANNE P. MULLIGAN \_\_\_\_\_

Appellant (person bringing the appeal), \_\_\_\_\_

vs. \_\_\_\_\_

DENALI UNIVERSAL SERVICES, INC \_\_\_\_\_

Appellee. \_\_\_\_\_

Supreme Court Case No. S-17980  
Superior Court Case No. 39N-19-13009C

**CERTIFICATE OF SERVICE**

I certify that on APRIL 8, 2021, I ☒ mailed ☐ personally delivered a copy of the following

(Date)

documents:

**APPELLANT'S RESPONSE TO 03/16/21 ORDER: MOTION TO COMPEL APPELLANT TO CONFORM STATEMENT OF POINT ON APPEAL TO APPELLATE RULE 204(e)**

to the attorneys or parties of record at their address listed below (list name and address where documents were mailed):

**DAVIS WRIGHT TREMAINE LLP**

**LAW OFFICES**

**188 W. NORTHERN LIGHTS BLVD., STE 1100**

**ANCHORAGE, AK 99503-3985**

4/8/2021  
Date

Anne P. Mulligan  
Your Signature

1 ANNE P. MULLIGAN  
2 GENERAL DELIVERY  
3 ANCHORAGE, AK 99501  
4 MULLIGANSTEW1969@OUTLOOK.COM  
5 907-717-5175

IN THE SUPREME COURT OF THE STATE OF ALASKA

5 ANNE P. MULLIGAN, PRO SE  
6 APPELLANT  
7 vs.  
8 DENALI UNIVERSAL SERVICES, INC.  
9 APPELLEE

SUPEREME COURT CASE: # S-17980  
TRIAL COURT CASE: # 3AN-19-12009CI

10 APPELLANT'S RESPONSE TO 03/16/21 ORDER: MOTION TO COMPEL APPELLANT TO  
11 CONFORM STATEMENT OF POINT ON APPEAL TO APPELLATE RULE 204(e)

12 The Appellant, Anne P. Mulligan is responding to the Supreme Courts 03/16/21 ORDER: Motion to  
13 Compel to Appellant to Conform Statement of Point on Appeal to Appellate Rule 204(e).

14 In regards to the first (1st) issue on appeal: Did the Superior Court err as a matter of law by  
15 dismissing Mulligan's HIPPA Claim against Denali? Yes.

16 The Appellant was an Emergency Room patient at Alaska Regional Hospital on July 10, 2018.  
17 During the Appellant's ER visit she had requested a consult to Social Work with the attending ER Physician  
18 Mark E. Shepherd. The Appellant was treated and released on July 10, 2018, without incident with the  
19 Alaska Regional Staff and the Security Staff. Travis Golay worked as a Security Guard on July 10, 2018. On  
20 July 11, 2018, DUS Security Guard Captain Travis Golay had filed an online APD harassment report  
21 #T18007756 stating that Anne Mulligan had called twice from the same number of 907-764-5945 which was  
22 identified on the caller ID as Anne Mulligan. On July 11, 2018 on page 32 of Appellant's ARH Medical  
23 Records the date of visit was April 17, 2017 (the Appellant is a victim of a pre-meditated hate crime from  
24 APD in which the Appellant was injured by use of illegal excessive force by both APD officers and denied  
25 medical assistance from the APD officers) the Appellant's ARH Medical records shows that it was stamped  
26 Date Reviewed: 07/11/2018. On July 11, 2018, on pages 54 and 72 of the Appellant's ARH Medical Records  
27 the date of visit was April 19, 2017, it shows that it was stamped Date Reviewed: 07/11/2018. When an  
28 Alaska Regional Hospital Employee accesses a patients chart it enters and or stamps the ARH User's name

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MULLIGAN VS. DENALI UNIVERSAL SERVICES  
SUPREME COURT CASE # S-17980  
SUPERIOR COURT CASE # 3AN-19-12009 CI

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1 on the patient chart. When the Appellant's ARH medical records were reviewed on July11, 2018, it did not  
2 show an ARH Employee User Name. It just shows Date Reviewed: 07/11/2018. DUS Employee Travis Golay's  
3 email for ARH is:travis.golay@hcshealthcare.com.

4 On July 12, 2018, in the statement that Travis Golay gave to Officer Stack in APD police case #18-  
5 28068, case #3AN-18-06534CR, he was able to explain that the number (907)764-5945 has been used in ANNE  
6 MULLIGAN's medical records in the past when Anne was allowed to visit there. ARH Hospital and DUS  
7 Security Personnel have a trespass file on the Appellant with her name and phone number of (907)764-5945.  
8 Travis Golay had also filed an Online Police report on July 11, 2018 less than 24 hours from the incident on  
9 July 12, 2018 and did not inform Officer Stack of the online Police report that he had filed on the Appellant  
10 which he stated that the Appellant had called twice from 907-764-5945 and that her name was identified on  
11 the caller ID. The Appellee failed to explain Travis Golay's memory lapse and judgement of not being able to  
12 recall and explain to APD of the Appellant contacting ARH within 24 hours and that her name and cell phone  
13 number of (907)764-5945 was identified on ARH caller id.

14 On July 12, 2018, Travis Golay and ARH Employee Jessica was interviewed by Officer Stack they  
15 both stated that they were in fear that either they were going to be injured or other people in the hospital  
16 could be hurt. Yet the Appellee's employee Travis Golay never contacted the FBI in regards to the allegations  
17 that he made against the Appellant.

18 On July 13, 2018, ARH Employee Yonuschot and DUS employee Travis Golay completed an online  
19 petition for a Stalking Protective Order against the Appellant which was subsequently denied. DUS failed to  
20 submit it as an exhibit to the Superior Court a copy of the denied Online Petition for a Stalking Protective  
21 Order that Travis Golay and ARH employee Yonuschut filed online together. If ARH employee Yonuschut  
22 and Travis Golay had that much fear in regards to the Appellant than it would have been approved

23 On September 28, 2018, Alaska State Attorney General filed a motion with the Anchorage Superior  
24 Court regarding case #3AN-18-06534CR with Amended Information: Count I-AS11.56.810(a)(a)(A)  
25 Attempted Terroristic Threatening in the Second-Degree Anne Patricia Mulligan-001. The District Attorney  
26 Stated that the date of the crime occurred on July 10, 2018. The Appellant was an ARH ER patient. The  
27 Appellant never informed or had any contact with any State of Alaska Personnel in regards to her ARH visit  
28 on July 10, 2018.

March 27, 2019, State Attorney General Kevin G. Clarkson dismissed case #3AN-18-06534CR  
without prejudice against the APPELLANT.

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**MULLIGAN VS. DENALI UNIVERSAL SERVICES**  
**SUPREME COURT CASE #S-17980**  
**SUPERIOR COURT CASE # 3AN-19-12009 CI**

**APPELLANT'S RESPONSE TO 03/16/21 ORDER: MOTION TO COMPEL APPELLANT TO  
CONFORM STATEMENT OF POINT ON APPEAL TO APPELLATE RULE 204(e)**

1 On April 19, 2019 ( 23 days after the charges in case #3AN-18-06534CR, APD case 18-28068 #were  
2 dismissed against the Appellant) Alaska Regional Hospital Employee Yonuschot submitted a 4-page timeline  
3 to the FBI agent Derek Depesland regarding the Appellant and the "Alleged Bomb Threats" from June 2018  
4 and July of 2018.

5 In August of 2019, the Appellant spoke with FBI AGENT Elliot and he explained to the Appellant he  
6 didn't know who the Appellant was and wasn't aware of any Bomb Threats that occurred at Alaska Regional  
7 Hospital in June 2018 and July of 2018.

8 In regards to the second (2nd) issues on appeal: Were there material fact in dispute, particularly  
9 about Mulligan's cell phone records, barring summary judgement, or did the superior court err by  
10 concluding Denali was entitled to judgement as a matter of law on uncontested material facts? Yes. The  
11 Appellant's complaint specifically was in regards to July of 2018.


12 On April 23, 2020, the Appellee's Attorney Patricia Vecera obtained a Subpoena for Taking  
13 Deposition to Records Custodian, (GCI. A Notice was served upon the Appellant along with Exhibit A.  
14 Exhibit A, 1. Provide all documents, billing records, call logs and other records (907)764-5945, registered to  
15 Anne Mulligan, address of record: 337 E. 4th Ave., Ste, 209, Anchorage, AK 99501, for the months of June  
16 2018, and July 2018, including, but not limited to, identification of all outgoing interstate and intrastate calls  
17 made from this number. The Appellant also received a Notice of Records Deposition that stated that the  
18 Appellant was invited to attend and cross examine. On May 15, 2020, the Appellee's attorney received an  
19 email from GCI Records Custodian Fred Gorsch in regards to the Appellant's GCI records. The Appellee's  
20 attorney Patricia Vecera illegally received the Appellant's GCI phone records for the month of June 2018 and  
21 also received the Appellants billing records of the Appellant's address of record: 337 E. 4th Ave., Ste 209,  
22 Anchorage, AK 99501. The Appellant wasn't living at the above stated address in July 2018. The Appellee  
23 didn't notify the Appellant that she had received her GCI records. The Appellee's attorney didn't' cancel the  
24 Deposition of the Records Custodian for GCI on May 21, 2020 in which the Appellant would have had the  
25 opportunity to attend and cross examine. The Appellant wasn't aware of the Appellee's attorney had the  
26 Appellant's GCI information until after May 20, 2020 when the Appellee's attorney filed for a Summary  
27 Judgement. In the Appellee's attorney Affidavit she continues to mention June 25, 2018 and yet June 2018 is  
28 not relevant to this case. The Appellee's attorney doesn't mention anything in regards to the Appellant's  
billing records that she received for the Appellant's in her affidavit and doesn't explain why she needed the  
billing records for the Appellant's address of 337 E4th. Ave. Ste 209, Anchorage, AK 99501in which the

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**MULLIGAN VS. DENALI UNIVERSAL SERVICES**  
**SUPREME COURT CASE #S-17980**  
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1 Appellant wasn't living there in July of 2018. In the Affidavit the Appellee's attorney Patricia Vecera  
2 submitted a true and correct copy of the Affidavit of Georgiana L. Yonuschot filed in case No. 3AN—17-  
3 09207 CI and dated April 19, 2019 in which the Appellee's attorney fails to comprehend that the Affidavit of  
4 Georgina L. Yonuschot submitted this affidavit and a 4 page timeline to FBI to FBI Derek Despeland 23 days  
5 after the charges were dismissed against the Appellant in case #3AN-18-06534CR. In August of 2019, the  
6 Appellant spoke with FBI AGENT Elliot and he explained to the Appellant he didn't know who the Appellant  
7 was and wasn't aware of any Bomb Threats that occurred at Alaska Regional Hospital in June 2018 and July  
8 of 2018. There was no Social Media coverage on any of the alleged BOMB Threats made by the Appellant in  
9 June and July of 2018 yet there was Social Media coverage on the November 17, 2018 BOMB THREAT at  
10 Alaska Regional Hospital and Travis Golay did work that night.

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13 Anne P. Mulligan  
14 Appellant  
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**MULLIGAN VS. DENALI UNIVERSAL SERVICES**  
**SUPREME COURT CASE #S-17980**  
**SUPERIOR COURT CASE # 3AN-19-12009 CI**

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